

EPA Comments on Title V Renewals

U.S. Steel Corporation, Edgar Thompson Works (0051-OP22)

Magnus Products LLC (0265-OP22)

TMS International, LLC (0225-OP22)

June 30, 2022

**I. PERMIT SUMMARY**

This action is a title V operating permit renewal for U.S. Steel Corporation, Edgar Thompson Works, Magnus Products LLC, and TMS International LLC, an iron and steel making facility and associated by product recovery and slag processing facilities located in Allegheny County, Pennsylvania. The three facilities are considered a single source for title V and NSR purposes, but administratively hold separate title V permits.

This permit is being processed sequentially, i.e., a proposed permit should be submitted to EPA with a Response to Comments. The day EPA receives the revised proposed permit would be Day 1 of EPA's 45-day review.

**II. GENERAL**

1. Single Source Determination: description of the three facilities' single source status is inconsistent between review memos. Please ensure all three review memos clarify ACHD's determination the facilities are considered a single major source for both Title V and New Source Review purposes and explain the basis of the determination. Criteria should include adjacency, common control, and SIC code per ACHD Article XXI §2101.20 and 40 CFR §70.2 definition of major source and 40 CFR §52.21(b) definition of stationary source.
2. Potential to Emit Limits: the three draft permits incorporate potential to emit (PTE) lb/hr and tpy emissions limits for various sources and pollutants. The review memos and associated spreadsheets explain how limits were calculated; however, the underlying regulatory authority for including these limits in the title V permit is unclear. For instance, see Table V-A-1 Blast Furnace No. 1 Emission Limitations on page 45 of the draft Edgar Thompson permit. The two citations for the table only reference operating permit application requirements and a particulate pound per production limit for iron/and or steel making (different from units of measurement in table).
  - a. Please ensure the underlying authority and origin for all emissions limits newly incorporated into the permit (including but not limited Table V-A-1) are identified in the permit and explained in the review memo. See ACHD Article XXI §2103.12(g)(1) and 40 CFR §70.6(a)(1)(i)
  - b. Note: title V permits function to assure compliance with underlying applicable requirements, and do not impose substantive new requirements beyond those necessary to assure compliance. See 40 CFR §70.1(b). Emissions limits should be established via an underlying, federally enforceable authority before incorporation

into a title V operating permit or they must be identified as state-only/local-only requirements under an identifiable state/local authority .

### **III. EDGAR THOMPSON COMMENTS:**

#### **A. Monitoring**

3. Draft permit, Condition H.3.a (pg 106): “The permittee shall install, calibrate, maintain, and operate a CEM for Riley Boilers No. 1, 2 and 3, and record the output of each system, for measuring nitrogen oxide emissions discharged to the atmosphere.” The permit does not specify quality control procedures for CEMS. We recommend using either part 75 or part 60 CEMS QA/QC procedures, as appropriate (See Appendix F to Part 60 - Quality Assurance Procedures, and Appendix A to Part 75-Specifications and Test Procedures).
4. Throughout the permit, vague language (“a trained individual”) is used for visual emission observations. For each condition related to visual emission monitoring please specify the test method (i.e. Method 9, Method 22 etc).

#### **B. Applicable Requirements**

5. The draft permit describes the facility’s obligation to conform with the greenhouse gas reporting requirements of 40 CFR Part 98; however, the review memo indicates that this regulatory requirement does not apply to the facility. Please clarify this discrepancy.
6. The review memo, page 19, indicates that the facility’s Riley Boilers are exempt from the boiler MACT requirements of 40 CFR Part 63 Subpart DDDDD pursuant to “40 CFR 63.7506(b)(2)”. However, this citation does not appear to exist within Subpart DDDDD. Please clarify the applicability of the Subpart incorporate requirements in the permit as appropriate. Note that the regulatory text for this subpart has been updated several times. Additional information available at the following webpage: <https://www.epa.gov/stationary-sources-air-pollution/industrial-commercial-and-institutional-boilers-and-process-0>
7. Review memo page 3 indicates that all references to startup, shutdown and malfunction (SSM) have been removed because the US EPA has revised the NESHAP, Subpart FFFFF by eliminating startup, shutdown and malfunction requirements, effective January 11, 2021. However, there are still many conditions in the draft permit that point to the requirements of SSM. For example, on draft permit page 53, condition V.A.4.d.2 “The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.” Please clarify this discrepancy.
8. For the two emergency generators Gen-1 and Gen-2, please indicate in the review memo that NSPS subpart IIII is applicable (per the permit) and clarify the applicability of NESHAP subpart ZZZZ. If NESHAP subpart ZZZZ is applicable, please add requirements to the permit as appropriate.

#### **C. Compliance Status**

9. EPA’s Enforcement and Compliance History Online (ECHO) database indicates the facility has on an ongoing, unaddressed High Priority Violation for sulfur dioxide beginning

2/28/2019, particular matter beginning 6/25/2020, and a 5/17/2022 consent decree. See <https://echo.epa.gov/detailed-facility-report?fid=110001116934> and [https://echo.epa.gov/enforcement-case-report?activity\\_id=3601583467](https://echo.epa.gov/enforcement-case-report?activity_id=3601583467).

- a. Please provide information in the review memo about the current compliance status and compliance history of this facility.
- b. If the facility is out of compliance with any requirements, a compliance schedule is required at the time of operating permit issuance. See ACHD Article XXI §2103.12(d) and 40 CFR §70.6(c)(3).

#### **E. Administrative Comments**

10. The review memo (pg 3, paragraph 4) refers to NESHAP subpart FFFF. It should refer to subpart FFFFF.
11. Draft permit Condition H.1.h (pg. 105): “NO<sub>x</sub> emissions from each Riley Boilers No. 1, 2 or 3 shall not exceed the limitations in Table V-H-1 below.” It appears the condition should refer to Table V-H-2.
12. The page numbers listed in the draft permit’s Table of Contents do not match the document.

#### **IV. MAGNUS PRODUCTS COMMENTS**

13. Draft permit, Condition V. A.1.c (pg. 27): “The permittee shall minimize visible emissions due to the operation of the pugmills. (§2103.12.a.2.B, §2104.05)”. The language is vague and not enforceable. Please add additional specific requirements as appropriate.
14. Draft permit, Condition V.A.3.b (pg. 27): “Observations of visible emissions from the pugmills shall be performed once per week during normal daylight operations using EPA Method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. (§2103.12.i)”. Please include conditions explaining the corrective action required if there are observed emissions on and/or beyond the property line.

#### **V. TMS INTERNATIONAL COMMENTS**

##### **A. Comments on Review Memo/Permit**

15. Draft permit, Condition V.A.1.b (pg. 31): “The permittee shall minimize visible emissions due to the operation of the slag processing plant. [§2103.12.a.2.B]”. The language is vague and not enforceable. Please add additional specific requirements as appropriate.

16. Draft permit, Condition V.A.3.b (pg. 31): “Notations of visible emissions from the material processing plant shall be performed once per week during normal daylight operations using method 22. A trained individual shall record whether any emissions are observed and whether these emissions extend beyond the facility property line. [§2105.03; §2103.12.i]”. Please include conditions explaining the corrective action required if there are observed emissions on and/or beyond the property line.
17. Please clarify in the review memo the applicability of NSPS subpart IIII/JJJJ and NESHAP subpart ZZZZ for the diesel generator associated with P006 and incorporate requirements into the permit as appropriate.

**B. Administrative Comment**

18. Typo: pg. 39 reference to V.C.1.a should be V.C.1.g

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